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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

11 STATE OF WASHINGTON, et al.,

12 Plaintiffs,

13 v.

14 Donald TRUMP, et al.,

15 Defendants.

Case No. 2:25-cv-00127-JCC

**DECLARATION OF ALICIA  
YAMILETH CHAVARRIA LOPEZ**

16 I, Alicia Yamileth Chavarria Lopez, hereby declare:  
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18 1. My name is Alicia Yamileth Chavarria Lopez. I am over the age of 18 and am  
19 competent to testify regarding the matters described below. I am a putative class member in this  
20 case.

21 2. I am a citizen of El Salvador. I currently live in Bothell, Washington.

22 3. I have lived in the United States since 2016.

23 4. I live with my five-year-old child and my partner, who is the father of my child.

1           5.       I was born and was raised in El Salvador. I lived with my parents and my brother  
2 and went to school there until I came to the United States I had to flee El Salvador because of an  
3 abusive and violent situation. At that time, I did not think that the police would help me or  
4 protect me there. For this reason, I decided to come to the United States and seek asylum.

5           6.       I arrived in the United States in November 2016. I have applied for asylum before  
6 USCIS, and I have a work permit while my application is pending.

7           7.       I decided to come to Washington because my brother had already been here for a  
8 long time and was established here. I met my current partner at work in or around 2018 or 2019,  
9 and we've been together since then. We have one child together, a son, who is five, and we are  
10 expecting another baby. I have lived in Washington about eight years, and consider this my  
11 home.

12          8.       I found out around October or November 2024 that I was pregnant, and currently  
13 my expected due date is July 21, 2025.

14          9.       I heard about the president's executive order regarding birthright citizenship on or  
15 around January 20, 2025.

16          10.      I understand that, as I am not a U.S. citizen or lawful permanent resident (LPR) in  
17 the United States, and as the father of my child is also not a U.S. citizen or LPR, the government  
18 will not recognize my child's U.S. citizenship by birthright if they are born on or after February  
19 19, 2025.

20          11.      I am fearful for my unborn child's future in light of this executive order.

21          12.      Under this executive order, one of my children will have U.S. citizenship, and the  
22 other will not. This is important to me for many reasons, but especially for my child's future. I  
23 want both of my child to have access to education and to have authorization to work. And I do

1 not want my child to be precluded from accessing these opportunities. In this country, someone  
2 without an unrestricted social security number is no one. It is harder to get a job, to get a  
3 specialized education. Everything requires a social security number. I do not want my child cut  
4 off from accessing a better future for themselves. My five-year-old receives some public  
5 benefits, and I want my unborn child to be able to access these crucial benefit too. I also want my  
6 family to be together. I never want there to be any risk that one of my children will be separated  
7 from us, and do not want any risk that my unborn child will have to go to El Salvador, a place  
8 that I had to flee for my own safety.

9 13. I want to be a named plaintiff in this case and I understand that if the Court grants  
10 the motion for class certification, I would represent a large number of people who: (a) are not  
11 LPRs or U.S. citizens; and (b) are expecting a child who will likely be born after the executive  
12 order goes into effect, and therefore the government will not recognize their children's U.S.  
13 citizenship by birthright.

14 14. I also understand that the group of people I would represent includes both  
15 expectant parents who will be subject to the president's executive order on or before February 19  
16 and those who will be subjected to the executive order in the future, including people who  
17 become pregnant after the order goes into effect.

18 15. I understand that, as a class representative, I represent the interests of all class  
19 members in this lawsuit and that it is my responsibility to represent the interests of the whole  
20 class and not just my own personal interests.

21 16. I understand that my duty to be a class representative continues until the Court  
22 decides this case is no longer a class action, or the case is over.  
23

1           17. I understand and accept that any resolution of the lawsuit, for example by  
2 settlement and dismissal, is subject to Court approval and must be in the best interests of the  
3 class as a whole.

4           18. I understand that, by agreeing to become a class representative, I have a duty to  
5 take steps to help move the case forward, which I will do with my attorneys. I know that I must  
6 provide information to my attorneys that they feel is necessary for the case; give them documents  
7 I have if it is required; testify at a deposition or trial if necessary; and provide my attorneys with  
8 my contact information and current whereabouts because it may be necessary for them to contact  
9 me on short notice.

10           19. I understand that I am volunteering to represent many other families with similar  
11 claims. I believe it is important that all expectant parents with soon-to-be-born children who will  
12 be subject to these practices, as I and my unborn child will be, benefit from the lawsuit.

13  
14           I, Alicia Yamileth Chavarria Lopez, declare under penalty of perjury of the laws of the  
15 State of Washington and the United States that the foregoing is true and correct to the best of my  
16 knowledge and belief.

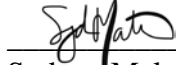
1 Executed in Seattle, Washington on January 23, 2025.

2  
3 By:   
4 Alicia Yamileth Chavarria Lopez

**CERTIFICATE OF INTERPRETATION**

I, Sydney Maltese, hereby certify that I read the foregoing to Alicia Yamileth Chavarria Lopez in Spanish, and that she indicated that she understood and agreed to the contents. I further certify that I am competent in both English and Spanish to render and certify such interpretation.

DATED this 23rd day of January, 2025.



Sydney Maltese  
Northwest Immigrant Rights Project  
615 Second Ave., Ste. 400  
Seattle, WA 98104